

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MICHELE CATALANO,
Plaintiff,

v.

BRIDGE OVER TROUBLED WATERS,
INC.,
Defendant.

Civil Action No. 05-11729 JLT

**JOINT MOTION TO EXTEND DEADLINE FOR COMPLETING
DEPOSITIONS AND TO RESCHEDULE DATE OF FURTHER CONFERENCE**

Plaintiff, Michele Catalano ("Plaintiff"), and Defendant, Bridge Over Troubled Waters, Inc. ("Defendant"), hereby move to extend the deadline for completing depositions and to reschedule the date of the Further Conference set for July 26, 2006 in light of the mediation scheduled in this matter for July 31, 2006. Specifically, the parties move to extend the deadline for completing depositions from July 21, 2006 up to and including Monday, January 15, 2007. The parties also move to reschedule the date of the Further Conference to a date subsequent to January 15, 2007.

As grounds for this motion, the parties state as follows:

1. The Court held a scheduling conference in this matter on April 11, 2006. At the scheduling conference, the Court set a discovery schedule for this case. Specifically, the Court set the following deadlines: (1) Plaintiff to provide documents related to Plaintiff's subsequent employment to Defendant by May 11, 2006; and (2) completion of the listed depositions by July 21, 2006. The Court also scheduled a Further Conference for July 26, 2006 at 2:15 p.m.

2. At the scheduling conference, Defendant's counsel raised the prospect of mediation and Plaintiff's counsel indicated that Plaintiff would consider mediation.

3. Plaintiff subsequently informed Defendant that she agreed to mediate this case.

Thereafter, the parties informed the Court of their desire to mediate this case.

4. On April 26, 2006, the Court issued an order referring this case to mediation.

5. On June 1, 2006, the Court scheduled the mediation of this case for September 21, 2006 before Magistrate Judge Leo Sorokin.

6. The parties subsequently agreed to mediate this case through a private mediator due to Plaintiff's counsel's planned maternity leave. The mediation is scheduled for Monday, July 31, 2006.

7. The parties would like to avoid the expense and time of what may be unnecessary discovery if the mediation is successful. Further, the parties do not believe that a Further Conference is necessary in light of the fact that the parties will mediate this case the following week.

8. Should this matter not be resolved at mediation, the parties will need more time than would otherwise be required to complete discovery given that Plaintiff's counsel will be on maternity leave from mid-August 2006 through mid-November 2006.

9. The parties request that the Court extend the deposition deadline up to and including Monday, January 15, 2007. The parties also request that the Court reschedule the Further Conference to a date subsequent to January 15, 2007.

WHEREFORE, the parties request that the Court extend the deadline for completing depositions up to and including Monday, January 15, 2007 and reschedule the Further Conference to a date subsequent to January 15, 2007.

Respectfully submitted,

MICHELE CATALANO,

BRIDGE OVER TROUBLED WATERS,
INC.,

/s/ Hillary Schwab

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Dated: July 20, 2006

CERTIFICATE OF SERVICE

This is to certify that on July 20, 2006, a copy of the foregoing document was electronically filed with the United States District Court for the District of Massachusetts through its Electronic Case Filing system.

/s/ Joan Ackerstein

Jackson Lewis LLP